REMARKS

The Applicant has carefully reviewed the Office Action mailed October 23, 2006 and offers the following remarks to accompany the above amendments.

Initially, the Applicant wishes to thank Examiner Bengzon for taking the time to speak with the Applicant's representative, Tony Josephson, on January 25, 2007 and January 30, 2007. During the Telephonic Interviews, the amendments to claims 39 and 47 along with U.S. Patent No. 6,169,897 B1 to *Kariya* (hereinafter "*Kariya*") were discussed. Furthermore, the Applicant's representative pointed out to Examiner Bengzon that in the present application, the features recited in claim 39 occur at an application server and that claim 47 recites an application server. Moreover, the Applicant's representative indicated to Examiner Bengzon that the operations occurring in the cited reference substantially occur at a mobile terminal, not at an application server. No agreement was reached regarding the pending claims and no indication of allowability was given by Examiner Bengzon.

As noted above, claims 39 and 47-54 have been amended. Support for these amendments can be found throughout the Specification, such as in paragraphs 0025-0027 and 0042. No new matter has been added; thus, no new search is required.

Claims 39-54 were rejected under 35 U.S.C. § 102(e) as being anticipated by *Kariya*. The Applicant respectfully traverses the rejection.

According to Chapter 2131 of the M.P.E.P., in order to anticipate a claim under 35 U.S.C. §102, "the reference must teach every element of the claim." The Applicant respectfully submits that *Kariya* does not disclose each and every element recited in claims 39-54. Accordingly, *Kariya* cannot anticipate these claims. More specifically, claim 39 has been amended to recite a method for operating an application server to provide content to a mobile terminal comprising, among other features, "determining if content is available for a current location of the mobile terminal." This step is provided by the application server. The Applicant respectfully submits that *Kariya* does not disclose that an application server determines if content is available for the current location of a mobile terminal. Instead, *Kariya* discloses that a mobile terminal performs these operations. In particular, *Kariya* discloses that a mobile terminal reads out a local representative URL corresponding to a location of the mobile terminal where the local representative URL is stored on the mobile terminal.[1] The mobile terminal then accesses a local

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[1] *See Kariya*, col. 5, ll. 25-34.

URL server with the local representative URL and the local URL server retrieves a link list page and sends the page to the mobile terminal.[2] Accordingly, *Kariya* does not disclose that an application server determines if content is available for a current location of a mobile terminal.

Claim 39 also recites "identifying which of the plurality of unique internet protocol addresses corresponds to the current location of the mobile terminal" by an application server. The Applicant submits that *Kariya* does not disclose that an application server identifies which of a plurality of unique internet protocol addresses corresponds to a current location of a mobile terminal. Instead, as detailed above, *Kariya* discloses that a mobile terminal identifies which of a plurality of unique internet protocol addresses corresponds to a current location of the mobile terminal. As such, for this reason and the reason noted above, claim 39 is patentable over the cited reference and the Applicant respectfully requests that the rejection be withdrawn. Likewise, claims 40-45, which ultimately depend from claim 39, are patentable for at least the same reasons along with the novel features recited therein.

Claim 46 recites "providing a profile of a user of the mobile terminal." The Applicant submits that *Kariya* does not disclose providing a profile of a user of a mobile terminal. In maintaining the rejection, the Patent Office states that *Kariya* discloses this feature at col. 1, ll. 30-40.[3] The Applicant respectfully disagrees. The Applicant has reviewed this portion of the reference along with the rest of the reference and respectfully submits that no portion of *Kariya* discloses providing a profile of a user of a mobile terminal. At most, *Kariya* discusses information services that provide residents of a particular geographical region with information peculiar to that particular geographical region.[4] However, nowhere does *Kariya* disclose that a profile for a user is provided as recited in claim 46.

Claim 46 also recites "screening the content associated with the plurality of unique internet protocol addresses based on the profile." The Applicant respectfully submits that *Kariya* does not disclose screening content associated with a plurality of unique internet protocol addresses based on a profile of a user for a number of reasons. First, as indicated above, *Kariya* does not disclose providing a profile of a user. As such, it follows that *Kariya* cannot disclose screening content based on a profile of a user. Second, even assuming *arguendo* that *Kariya* somehow did disclose providing a profile of a user, a point which the Applicant does not

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[2] *See Kariya*, col. 6, ll. 54-59.
[3] *See* Office Action mailed October 23, 2006, page 4.
[4] *See Kariya*, col. 1, ll. 33-35.

concede, *Kariya* still does not disclose screening content associated with a plurality of unique internet protocol addresses. Therefore, in addition to the reasons noted above, claim 46 is patentable over the cited reference and the Applicant respectfully requests that the rejection be withdrawn.

Claim 47 recites an application server having a control system that is adapted to "determine if content is available for the current location of the mobile terminal" and "identify which of the plurality of unique internet protocol addresses corresponds to the current location of the mobile terminal." As detailed above, *Kariya* does not disclose an application server that determines if content is available for a current location of a mobile terminal. Moreover, as detailed above, *Kariya* does not disclose an application server that identifies which of a plurality of unique internet protocol addresses corresponds to a current location of a mobile terminal. Therefore, claim 47 is patentable over *Kariya* and the Applicant respectfully requests that the rejection be withdrawn. Similarly, claims 48-53, which ultimately depend from claim 47, are patentable for at least these reasons along with the novel features recited therein.

Claim 54 recites that the control system is further adapted to "provide a profile of a user of the mobile terminal" and "screen the content associated with the plurality of unique internet protocol addresses based on the profile." As detailed above, *Kariya* does not disclose these features. Therefore, claim 54 is patentable for these additional reasons and the Applicant respectfully requests that the rejection be withdrawn.

The present application is now in condition for allowance and such action is respectfully requested. The Examiner is encouraged to contact the Applicant's representative regarding any remaining issues in an effort to expedite allowance and issuance of the present application.

Respectfully submitted,

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